

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE:

MOHAMMED MAHMUD HMAIDAN

DEBTOR

CASE NO 14-04432 MCF

CHAPTER 13

**DEBTOR'S REPLY TO TRUSTEE'S MOTION TO DISMISS**

**DOCKET NO. 90 and**

**REQUEST FOR EXTENSION OF TIME TO CURE BALANCE ON PLAN ARREARS**

TO THE HONORABLE COURT:

**COMES NOW, MOHAMMED MAHMUD HMAIDAN**, debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follows:

1. The Chapter 13 Trustee filed a *Trustee's Motion to Dismiss*, dated April 11, 2016, docket no. 90, basically stating that the debtors is in arrears in the Plan payments in the sum of \$1,575.00.

2. The debtor hereby replies to the Trustee's motion respectfully stating that on May 10, 2016, they made a \$700.00 Plan payment to the Trustee to partially cure the Plan arrears. Attached is evidence of manager's check #978506.

3. The debtor is still in arrears in the Plan payments (\$875) and the debtor proposes to cure these arrears within thirty (30) days.

4. Based on the aforementioned, the debtor respectfully requests an additional extension of time of thirty (30) days within to cure the Plan arrears and inform the Court, accordingly. This extension of time to expire on July 11, 2016.

**WHEREFORE** debtor respectfully prays this Honorable Court grant the present reply to the Trustee's motion requesting dismissal, and grant the requested extension of time.

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Debtors' Reply to Trustee's Motion to Dismiss  
Case no. 14-04432 MCF13

I HEREBY CERTIFY that on this same date a copy of this notice was sent via electronically with the Clerk of the Court using CM/ECF systems which will send notifications of such to the Chapter 13 Trustee; and also certify that I have mailed by United States Postal Service copy of this motion to the following non-participant: debtor, Mohammed Mahmud Hmaidan, to his address of record, in the above captioned case.

RESPECFULLY SUBMITTED. In San Juan, Puerto Rico, this 11<sup>th</sup> day of May, 2016.

/s/ Roberto Figueroa Carrasquillo  
USDC #203614  
RFIGUEROA CARRASQUILLO LAW OFFICE PSC  
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THIS MULTI-TONE AREA OF THE DOCUMENT CHANGES COLOR GRADUALLY AND EVENLY FROM DARK TO LIGHT WITH DARKER AREAS BOTH TOP AND BOTTOM

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## Manager's Check

Check No. 978506

101-7147/2215

PURCHASE: PATIENTS ESTIMATE CONSTRUCTION AND COST

Seven hundred Dollars

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